

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA §
§
v. § No. 4:22CR125
§ Judge Mazzant
JAMES WALKER WATSON, JR. §

ELEMENTS OF THE OFFENSE

You are charged in Count Two of the Indictment with a violation of
18 U.S.C. § 1343, Wire Fraud. The essential elements which must be proved beyond a
reasonable doubt in order to establish a violation of these sections are:

1. That the defendant knowingly devised or intended to devise any scheme to defraud, that is, the scheme to defraud described in the Indictment;
 2. That the scheme to defraud employed false material representations, or false material pretenses, or false material promises;
 3. That the defendant transmitted or caused to be transmitted by way of wire communications, in interstate commerce, any writing, or sign, or signal, for the purpose of executing such scheme; and
 4. That the defendant acted with a specific intent to defraud.

Respectfully submitted,

BRIT FEATHERSTON
UNITED STATES ATTORNEY

/s/

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed via electronic filing to defense counsel on April 5, 2023.

/s/

BRENT L. ANDRUS